

Carver, Beverley (DEQ)

From: Carver, Beverley (DEQ)
Sent: Friday, December 16, 2011 4:23 PM
To: Nelson Olavarria (nelson.olavarria@cooperindustries.com); Craig Gendron (craig.gendron@stantec.com)
Subject: Application complete letter for Cooper Industries, LLC - VA0027065
Attachments: Application complete letter - Cooper.pdf

Hi Nelson and Craig,

Attached is the application complete letter for Cooper. I realize that you all will be submitting a slightly revised application in the near future based on the comments received. I can switch out the revised pages when they are submitted. The main thing I need are the signature pages with the original signature.

Thank you for submitting the application early. This will enable me to work on the draft permit this month.

If you have any questions, let me know.

Sincerely,

Bev Carver

Beverley W. Carver
Environmental Engineer Senior
Department of Environmental Quality
Valley Regional Office
4411 Early Road
P.O. Box 3000
Harrisonburg, Virginia 22801
Phone: (540) 574-7805
Fax: (540) 574-7878

email: Beverley.Carver@deq.virginia.gov **NEW**



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

VALLEY REGIONAL OFFICE

Douglas W. Domenech
Secretary of Natural Resources

4411 Early Road, P.O. Box 3000, Harrisonburg, Virginia 22801
(540) 574-7800 Fax (540) 574-7878
www.deq.virginia.gov

David K. Paylor
Director

Amy Thatcher Owens
Regional Director

December 16, 2011

Mr. Nelson M. Olavarria
Director, Environmental Assessment and Remediation
Cooper Industries, LLC
PO Box 4446
Houston, TX 77210

Re: Cooper Industries, LLC, VPDES Permit No. VA0027065, Albemarle County

Dear Mr. Olavarria:

Your application has been reviewed and appears to be complete. The next steps involve assembling the information necessary to develop the permit limitations and then drafting the permit. Once the draft permit is prepared and the appropriate reviews are performed, I will transmit the draft permit and supporting documentation to you for review. I expect to have this draft permit package to you within the next 2 months.

The Department of Environmental Quality strives to complete the permitting process in a timely manner. If you have any questions about our procedures or the status of your draft permit, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Bev Carver".

Bev Carver
Environmental Engineer Senior

cc: Craig Gendron (via email)
Permit Processing File

Carver, Beverley (DEQ)

From: Carver, Beverley (DEQ)
Sent: Thursday, December 15, 2011 10:34 AM
To: 'Gendron, Craig'
Cc: Kiracofe, Brandon (DEQ)
Subject: RE: Cooper Application Review-VA0027065
Attachments: Signatory Requirements.pdf

Hi Craig,

I just talked with Brandon. He said what you submitted is fine. I was thinking about it incorrectly. Your email is saying that Nelson meets the criteria to sign the application per 9 VAC25-31-110A.a(ii). I apologize for the confusion!

Sincerely,

Bev


From: Gendron, Craig [mailto:Craig.Gendron@stantec.com]
Sent: Thursday, December 15, 2011 9:16 AM
To: Carver, Beverley (DEQ)
Cc: Kiracofe, Brandon (DEQ); Gendron, Craig
Subject: RE: Cooper Application Review-VA0027065

OK, I'll await final word from your boss. I nearly copied the language in the Signatory Requirements into the letter below, but if that still won't work for some reason, we'll have to go back to the tactic we have used in the past.

Thanks,
Craig

Craig R. Gendron, P.G., P.E., L.S.R.P.
Principal
Stantec
5 Dartmouth Drive Suite 101
Auburn NH 03032
Ph: (603) 206-7556
Fx: (603) 669-7636
Cell: (603) 498-0226
craig.gendron@stantec.com
stantec.com

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 Please consider the environment before printing this email.

From: Carver, Beverley (DEQ) [mailto:Beverley.Carver@deq.virginia.gov]
Sent: Thursday, December 15, 2011 8:49 AM
To: Gendron, Craig
Cc: Kiracofe, Brandon (DEQ)
Subject: RE: Cooper Application Review-VA0027065

Craig,

The application is the sole form where it must be signed by the principal executive officer. Below is an example of a principal executive officer authorizing Nelson to sign the application which will not work. Nelson can sign every other document submitted to DEQ with the exception of the application.

I copied my boss to see if he sees this differently.

Bev

From: Gendron, Craig [mailto:Craig.Gendron@stantec.com]
Sent: Wednesday, December 14, 2011 6:22 PM
To: Carver, Beverley (DEQ)
Cc: Gendron, Craig
Subject: RE: Cooper Application Review-VA0027065

Bev,

Would the text below on Cooper letterhead be acceptable in terms of authorizing Nelson to sign the VPDES Permit Renewal?

December 15, 2011

To whom it may concern,

Nelson Olavarria is a duly elected Director, Environmental Assessment and Remediation of Cooper Industries, LLC. In that capacity, Mr. Olavarria is responsible for managing compliance operations and preparing budgets for capital expenditures required for the long-term compliance with environmental laws and regulations of the subject facility in Earlysville, VA, among other facilities. Included in his management function is the authorization to execute such permits as may be necessary to maintain said compliance, including, in the case of the subject facility, a VPDES Permit Renewal Application. The authority to sign said documents was assigned in accordance with corporate procedures.

Signed,

Date: _____

Corporate Secretary

Thanks,
Craig

From: Carver, Beverley (DEQ) [mailto:Beverley.Carver@deq.virginia.gov]
Sent: Monday, December 05, 2011 3:29 PM
To: Gendron, Craig
Subject: Cooper Application Review-VA0027065

Hi Craig,

I was trying to organize all the application attachments you sent in by naming the attachment and describing what it was. I also added a couple of attachments that I thought would be helpful to people besides me who would be reading the application.

1. I added Attachment B – site plan
2. I thought on Attachment C – WWTP you could write up a description about how the WWTP is operated. I liked the description about how the GAC units were in series and if there was breakthrough on the first couple of units, then the cartridges were replaced and rotated. In addition you could state that an air stripper is being added.
3. Attachment D – You sent me the entire August 2011 report previously. The reason why I thought the most recent report would be helpful for the application is because it gives a good description of the site history and the relationship between the ground water monitoring program and the VPDES permit.
4. Attachment F – Monthly Flow readings – I'm not sure if this attachment is helpful because we already have the flow data reported on the DMRs. The table gives the flow on the first day of each month and does not match the flows reported on the DMRs so I don't think that is helpful to the application. It looks like it is calibration information?
5. Attachment G – pH meter check/calibration – This attachment does not seem to be helpful for the application. We already have the pH data reported on the DMRs.
6. Attachment H – The 2006 data for ammonia, BOD and TSS are 5 years old. The information was already reported on the 2007 application. So including it in the 2011 application is not necessary.
7. Temperature data – report that on the application since you have data at outfall 001.
8. Form 2c, Part V.C., page V-5 – include the data for 1,1,2,2 Tetrachloroethane and TCE.
9. Signature – Please have Nelson verify that he meets the attached signatory requirements.

If you have any questions, let me know!

Bev

Beverley W. Carver
Environmental Engineer Senior
Department of Environmental Quality
Valley Regional Office
4411 Early Road
P.O. Box 3000
Harrisonburg, Virginia 22801
Phone: (540) 574-7805
Fax: (540) 574-7878
email: Beverley.Carver@deq.virginia.gov **NEW**

Carver, Beverley (DEQ)

From: Gendron, Craig [Craig.Gendron@stantec.com]
Sent: Wednesday, December 07, 2011 11:42 AM
To: Carver, Beverley (DEQ)
Cc: Gendron, Craig; Olavarria, Nelson
Subject: RE: Cooper Application Review-VA0027065
Attachments: Signatory Requirements.pdf

Thanks for your comments, Bev. I have a few points of clarification for you. I've numbered each to correspond to the numbering in your e-mail below.

- ✓ 1. Added, no further comments.
- ✓ 2. Added, no further comments.
- ✓ 3. Here is the description that will be added to the cover sheet for Attachment C:
"An Air Stripper is being incorporated to remove VOCs prior to GAC Treatment. For each of the two parallel GAC treatment trains, the upstream GAC unit is changed out once the VOC threshold has been reached. At that point, the downstream GAC unit is moved to the upstream position and a fresh (unused) GAC unit is moved into the downstream position."
- ✓ 4. This spreadsheet was included to show the basis for the flow numbers input on Page V-1 of Form 2C. We'll relabel Attachment F as "Calculation of Monthly Maximum and Long-Term Average Flows for Outfall 001 for Period of January 2004 to October 2011".
- ✓ 5. This spreadsheet was included to show the basis for the pH values input on Page V-1 of Form 2C. We'll relabel Attachment F as "Calculation of Monthly Minimum and Maximum pH Values and Long-Term Average Temperature Values for Outfall 001 for Period of October 2004 to October 2011".
6. We have no other more recent data for TSS and we have removed it as a requested Waiver item as you suggested, so it seems appropriate to use the data even though it is dated. However, since we are asking for a Waiver for the remaining two analytes, ammonia and BOD, we have removed them from the title of this Attachment.
- ✓ 7. Added to Attachment G (see item 5 above).
- ✓ 8. Added, no further comments.
- ✓ 9. Nelson will let you know if he meets the attached signatory requirements.

With the clarifications noted above, we plan to finalize the Renewal Application (including Waiver Request) and issue it to you. Please let us know if you see any issues with us following this approach.

Thanks again, Bev,
Craig

Craig R. Gendron, P.G., P.E., L.S.R.P.

Principal
Stantec

5 Dartmouth Drive Suite 101

Auburn NH 03032

Ph: (603) 206-7556

Fx: (603) 669-7636

Cell: (603) 498-0226

craig.gendron@stantec.com

stantec.com

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From: Carver, Beverley (DEQ) [<mailto:Beverley.Carver@deq.virginia.gov>]
Sent: Monday, December 05, 2011 3:29 PM
To: Gendron, Craig
Subject: Cooper Application Review-VA0027065

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9. Signature – Please have Nelson verify that he meets the attached signatory requirements.

If you have any questions, let me know!

Bev

Beverley W. Carver
Environmental Engineer Senior
Department of Environmental Quality
Valley Regional Office
4411 Early Road
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Harrisonburg, Virginia 22801
Phone: (540) 574-7805
Fax: (540) 574-7878

email: Beverley.Carver@deq.virginia.gov **NEW**

Carver, Beverley (DEQ)

From: Carver, Beverley (DEQ)
Sent: Monday, December 05, 2011 3:29 PM
To: Craig Gendron (craig.gendron@stantec.com)
Subject: Cooper Application Review-VA0027065
Attachments: Application Attachments-Cooper.pdf; Signatory Requirements.pdf

Hi Craig,

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9. Signature – Please have Nelson verify that he meets the attached signatory requirements.

If you have any questions, let me know!

Bev

Beverley W. Carver
Environmental Engineer Senior
Department of Environmental Quality
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Phone: (540) 574-7805
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email: Beverley.Carver@deq.virginia.gov **NEW**

Carver, Beverley (DEQ)

From: Gendron, Craig [Craig.Gendron@stantec.com]
Sent: Wednesday, November 23, 2011 2:50 PM
Subject: Carver, Beverley (DEQ)
Attachments: Olavarria, Nelson; Gendron, Craig
Waiver Request/VPDES Renewal, Cooper, Earlysville, VA, VPDES #: VA0027065
Cooper_Earlysville_VA_VPDES_Waiver_Renewal_2011.pdf

Bev,

As discussed, attached is the Waiver Request. We've also included the VPDES Renewal. If there are improvements that you feel would be beneficial to ensuring timely action on this Renewal, please let us know and we can revise accordingly.

Thanks for all of your help on this Renewal.

Have a Great Thanksgiving Holiday, Bev!
Craig

Craig R. Gendron, P.G., P.E., L.S.R.P.

Principal
Stantec

5 Dartmouth Drive Suite 101

Auburn NH 03032

Ph: (603) 206-7556


Fx: (603) 669-7636

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 Please consider the environment before printing this email.

Cooper Industries, LLC
P. O. Box 4446
Houston, Texas 77210

600 Travis, Suite 5600
Houston, TX 77002-1001
Phone: (713) 209-8400
Fax: (713) 209-8996



Via Federal Express – Next Day Delivery

November 21, 2011

Ms. Beverley Carver, Permit Writer
Commonwealth of Virginia
Department of Environmental Quality
Valley Regional Office
4411 Early Road
Harrisonburg, VA 22801

**Re: Request for Waiver of Additional Effluent Monitoring, VPDES Renewal Application
VPDES #: VA0027065
Cooper Industries, Former Earlysville, VA Facility**

Dear Ms. Carver:

As discussed during recent telecoms and/or meetings between you, our Consultant in this matter, Stantec Consulting Services, Inc. (Stantec), and Cooper Industries, LLC (Cooper), the Department will consider a request for a waiver of additional effluent monitoring (the "Request") associated with the above-referenced Renewal Application (the "Renewal") provided the Request is submitted in writing to the Virginia Department of Environmental Quality (the "Department"). To this end, we have provided below written justification for this Request.

Consistent with discussions you had with Stantec during your November 3, 2011 Site Inspection, we would also like to use this Request to inform the Department that chlorine tablet usage has been discontinued. You may recall that chlorine tablets had been used in the past to control algal growth in the 30,000 gallon holding tank during the warm summer months. For this sole reason, Total Residual Chlorine was added as a required monitoring parameter in the VPDES Permit for the last five years, the term of the current VPDES Permit. Over this term, there were no exceedances of Permit Limits for Total Residual Chlorine. In fact, the readings were all below required Quantitation Limits. Since April 2011, chlorine tablet usage was discontinued. In its place, the water level in the 30,000-gallon holding tank has been maintained at a lower level and the distance between the low and high level setpoints in the tank were reduced. Both of these procedures served to control algal growth to a point where chlorine tablets addition were no longer required. Cooper has no plans to use chlorine tablets again and understands that if this situation changes, the Department will require notification. For this

reason, Total Residual Chlorine has been listed as "Believed Absent" on Form 2C of the VPDES Permit Renewal Application and Cooper understands that Total Residual Chlorine will not be a required monitoring parameter under the renewed Permit.

- *As part of the 2002 and 2007 Permit Reissuance Applications, Cooper provided composite sampling results for a broad range of analytes, none of which were subsequently included as parameters to be monitored for under the VPDES Permit*

Included with Cooper's 2002 VPDES Permit Reissuance Application, composite sampling results from the Outfall were included for a number of analytes, including the following parameter:

- COD.

The result was below detection limit (BDL).

Included with Cooper's 2007 VPDES Permit Reissuance Application, composite sampling results from the Outfall were included for the following parameters (raw laboratory results are attached):

- ammonia;
- BOD; and
- TSS.

None of the detections warranted their eventual inclusion as monitored parameters in the VPDES Permit.

- *As part of the e-DMR filings associated with this facility, historical summaries of the quarterly temperature readings have been included. Temperature has never had a limit in the VPDES Permit.*

Attached is the table (Table 6) included with the most recent e-DMR filing that includes these temperature readings.

Based on these factors, we are respectfully requesting that the VADEQ waive the requirement to collect any additional samples in support of the Permit Reissuance Application due in January 2012, including those that may be associated with Total Maximum Daily Load (TMDL) limitations under consideration at the Department.

Ms. Beverley Carver
November 21, 2011
Page 3 of 3

We look forward to your response to this Request. If you should have any questions or comments, please contact me at (713) 209-8850.

Sincerely,

A handwritten signature in black ink, reading "Nelson M. Olavarria". The signature is written in a cursive style with a large, stylized 'N' and 'O'.

Nelson M. Olavarria
Director Environmental Assessment and Remediation

attachments

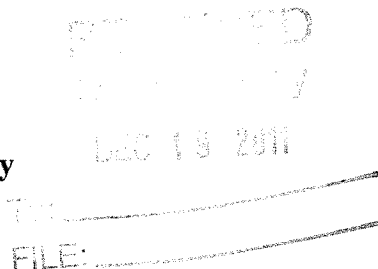
cc: Carroll Sullivan, Sullivan Electric, Inc. w/attachments
Craig R. Gendron, Stantec w/attachments
Donnie Foster, Foster Well & Pump w/attachments

Cooper Industries, LLC
P. O. Box 4446
Houston, Texas 77210

600 Travis, Suite 5600
Houston, TX 77002-1001
Phone: (713) 209-8400
Fax: (713) 209-8996



Via Federal Express – Next Day Delivery



December 15, 2011

Ms. Beverley Carver, Permit Writer
Commonwealth of Virginia
Department of Environmental Quality
Valley Regional Office
4411 Early Road
Harrisonburg, VA 22801

**Re: Request for Waiver of Additional Effluent Monitoring, VPDES Renewal Application
VPDES #: VA0027065
Cooper Industries, Former Earlysville, VA Facility**

Dear Ms. Carver:

As discussed during recent telecoms and/or meetings between you, our Consultant in this matter, Stantec Consulting Services, Inc. (Stantec), and Cooper Industries, LLC (Cooper), the Department will consider a request for a waiver of additional effluent monitoring (the "Request") associated with the above-referenced Renewal Application (the "Renewal") provided the Request is submitted in writing to the Virginia Department of Environmental Quality (the "Department"). To this end, we have provided below written justification for this Request.

Consistent with discussions you had with Stantec during your November 3, 2011 Site Inspection, we would also like to use this Request to inform the Department that chlorine tablet usage has been discontinued. You may recall that chlorine tablets had been used in the past to control algal growth in the 30,000 gallon holding tank during the warm summer months. For this sole reason, Total Residual Chlorine was added as a required monitoring parameter in the VPDES Permit for the last five years, the term of the current VPDES Permit. Over this term, there were no exceedances of Permit Limits for Total Residual Chlorine. In fact, the readings were all below required Quantitation Limits. Since April 2011, chlorine tablet usage was discontinued. In its place, the water level in the 30,000-gallon holding tank has been maintained at a lower level and the distance between the low and high level setpoints in the tank were reduced. Both of these procedures served to control algal growth to a point where chlorine tablets addition were no longer required. Cooper has no plans to use chlorine tablets

again and understands that if this situation changes, the Department will require notification. For this reason, Total Residual Chlorine has been listed as "Believed Absent" on Form 2C of the VPDES Permit Renewal Application and Cooper understands that Total Residual Chlorine will not be a required monitoring parameter under the renewed Permit.

- *As part of the 2002 and 2007 Permit Reissuance Applications, Cooper provided composite sampling results for a broad range of analytes, none of which were subsequently included as parameters to be monitored for under the VPDES Permit*

Included with Cooper's 2002 VPDES Permit Reissuance Application, composite sampling results from the Outfall were included for a number of analytes, including the following parameters:

- COD; and
- TOC.

The results were below detection limit (BDL).

Included with Cooper's 2007 VPDES Permit Reissuance Application, composite sampling results from the Outfall were included for the following parameters:

- ammonia; and
- BOD.

None of these parameters are pollutants of concern at this Site and none of the detections of any of these analytes warranted their eventual inclusion as monitored parameters in the VPDES Permit. In fact, the treatment plant that is the subject of the VPDES Permit for this Site is in place as a result of a RCRA Corrective Measures Implementation Plan (CMIP). Under the CMIP, only VOCs are required to be treated.

Based on these factors, we are respectfully requesting that the VADEQ waive the requirement to collect any additional samples in support of the Permit Reissuance Application due in January 2012, including those that may be associated with Total Maximum Daily Load (TMDL) limitations under consideration at the Department.

We look forward to your response to this Request. If you should have any questions or comments, please contact me at (713) 209-8850.

Sincerely,

A handwritten signature in black ink, reading "Nelson M. Olavarria". The signature is fluid and cursive, with the first name "Nelson" and last name "Olavarria" clearly legible, and a middle initial "M." in between.

Nelson M. Olavarria
Director Environmental Assessment and Remediation

cc: Carroll Sullivan, Sullivan Electric, Inc.
Craig R. Gendron, Stantec
Donnie Foster, Foster Well & Pump

Cooper Industries, LLC
P. O. Box 4446
Houston, Texas 77210

600 Travis, Suite 5600
Houston, TX 77002-1001
Phone: (713) 209-8400
Fax: (713) 209-8996



Via Federal Express – Next Day Delivery

December 15, 2011

Ms. Beverley Carver, Permit Writer
Commonwealth of Virginia
Department of Environmental Quality
Valley Regional Office
4411 Early Road
Harrisonburg, VA 22801

RECEIVED
— Valley
DEC 19 2011
To: _____
FILE: _____

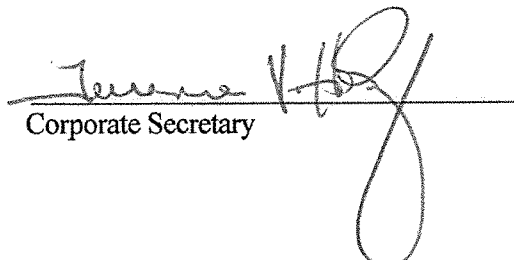
Re: VPDES Renewal Application, Signature Authorization
VPDES #: VA0027065
Cooper Industries, Former Earlysville, VA Facility

Dear Ms. Carver:

Nelson Olavarria is a duly elected Director, Environmental Assessment and Remediation of Cooper Industries, LLC. In that capacity, Mr. Olavarria is responsible for managing compliance operations and preparing budgets for capital expenditures required for the long-term compliance with environmental laws and regulations of the subject facility in Earlysville, VA, among other facilities. Included in his management function is the authorization to execute such permits as may be necessary to maintain said compliance, including, in the case of the subject facility, a VPDES Permit Renewal Application. The authority to sign said documents was assigned in accordance with corporate procedures.


Signed,

Date: Dec 15, 2011


Corporate Secretary

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER VA0027065		T/A C D					
LABEL ITEMS				GENERAL INSTRUCTIONS							
I. EPA I.D. NUMBER				<p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorization under which this data is collected.</p>							
III. FACILITY NAME											
V. FACILITY MAILING LIST											
VI. FACILITY LOCATION											
PLEASE PLACE LABEL IN THIS SPACE											
II. POLLUTANT CHARACTERISTICS											
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.											
SPECIFIC QUESTIONS			MARK "X"			SPECIFIC QUESTIONS			MARK "X"		
			YES NO FORM ATTACHED						YES NO FORM ATTACHED		
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>			B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>		
			16 17 18						19 20 21		
C. Is this facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			D. Is this proposal facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>		
			22 23 24						25 26 27		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>		
			28 29 30						31 32 33		
G. Do you or will you inject at this facility any produced water other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>			H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>		
			34 35 36						37 38 39		
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>			J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>		
			40 41 42						43 44 45		
III. NAME OF FACILITY											
C SKIP Cooper Industries, LLC											
1 15 16-29 30 69											
IV. FACILITY CONTACT											
A. NAME & TITLE (last, first, & title)						B. PHONE (area code & no.)					
C 2 Olavarria, Nelson, Director Environmental Assessment & Remediation						713 209 8850					
15 16 45 46 48 49 51 52 55											
V. FACILITY MAILING ADDRESS											
A. STREET OR P.O. BOX											
C 3 PO Box 4446											
15 16 45											
B. CITY OR TOWN						C. STATE D. ZIP CODE					
C 4 Houston						TX 77210					
15 16 40 41 42 47 51											
VI. FACILITY LOCATION											
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER											
C 5 395 Reas Ford Road											
15 16 45											
B. COUNTY NAME											
Albemarle											
46 70											
C. CITY OR TOWN						D. STATE E. ZIP CODE F. COUNTY CODE					
C 6 Earlysville						VA 22936					
15 16 40 41 42 47 51 52 54											

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)																																		
A. FIRST															B. SECOND																			
C 7	NA				(specify) groundwater remediation										C 7	(specify)																		
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
C. THIRD															D. FOURTH																			
C 7					(specify)										C 7	(specify)																		
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
VIII. OPERATOR INFORMATION																																		
A. NAME																				B. Is the name listed in item VIII-A also the owner?														
C 8	Cooper Industries, LLC															<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																		
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other," specify.)															D. PHONE (area code & no.)																			
F = FEDERAL S = STATE P = PRIVATE															M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify)					C A 713 209 8850				
E. STREET OR PO BOX															55																			
PO Box 4446																																		
F. CITY OR TOWN															G. STATE					H. ZIP CODE					IX. INDIAN LAND									
C B	Houston										TX					77210					Is the facility located on Indian lands?													
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
X. EXISTING ENVIRONMENTAL PERMITS																																		
A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																			
C 9	T N	I I	VA0027065												C 9	T P	I I																	
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																			
C 9	T U	I I													C 9	T I	I I																	
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																			
C 9	T R	I I													C 9	T I	I I																	
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
XI. MAP																																		
<p>Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.</p>																																		
XII. NATURE OF BUSINESS (provide a brief description)																																		
<p>The facility currently extracts and treats groundwater in compliance with a USEPA RCRA Corrective Measures Implementation Plan (CMIP) Consent Order dated April 1992 and April 1992 Record of Decision. Manufacturing operations ceased in April 1992. Volatile Organic Compounds (VOCs) are sampled quarterly at outfall 001 under the CMIP. The data indicate that 100% of the VOCs are removed from Outfall 001. Sanitary wastewater is directed to a septic tank drainfield.</p>																																		
XIII. CERTIFICATION (see instructions)																																		
<p>I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.</p>																																		
A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE										C. DATE SIGNED									
Nelson M. Olavarria, Director Environmental Assess. & Remediation																									12-15-2011									
COMMENTS FOR OFFICIAL USE ONLY																																		
C C															C C																			
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									

Please type or print in the unshaded areas only		EPA ID Number (Copy from Item 1 of Form 1) VA0027065		Form Approved OMB No. 2040-0086 Approval expires 8-31-98	
Form 2C NPDES				U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS <i>Consolidated Permits Program</i>	
I. Outfall Location					
For this outfall, list the latitude and longitude, (degrees, min.xxxx) and name of the receiving water(s)					
Outfall Number (list)	Latitude		Longitude		Receiving Water (name)
	Deg	Min	Deg	Min	
001	38	08	78	29	South Fork Rivanna River, UT
					Latitude: 38 08 37
					Longitude: 78 29 39
II. Flows, Sources of Pollution, and Treatment Technologies					
A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed description in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.					
B. For each outfall, provide a description of (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.					
1. Outfall No. (list)	2. Operations Contributing Flow		3. Treatment		
	a. OPERATION (list)	b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
001	Groundwater Remediation	0.020	Carbon Adsorption	2-A	
	Groundwater is recovered from 6 remediation wells to remove VOCs. Quarterly monitoring of VOCs is conducted and submitted to EPA and DEQ under a Corrective Measures Implementation Plan (CMIP)		Settling Tank	I-U	
			Air Stripper		
			Equalization Tank		
			Sand Filters		
			Cartridge Filters		
			Flow Meter		

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ **YES** (complete the following table)

☒ **NO** (go to Section III)

[illegible]

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☐ YES (complete Item III-B)☒ **NO** (go to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

☐ YES (complete Item III-C)

☒ NO (go to Section IV)

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION

2. AFFECTED
OUTFALLS
(list outfall numbers)

[illegible]

IV. IMPROVEMENTS

A. Are you now required by any Federal, State, or local authority to meet any implementation schedule for the construction, upgrading, or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (complete the following table)

☒ **NO** (go to Item IV-B)

[illegible]

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction.

☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAM IS ATTACHED

V. INTAKE AND EFFLUENT CHARACTERISTICS

NOTE: Tables V-A, V-B, and V-C are included on separate sheets number V-1 through V-9.

[illegible]

Is any pollutant listed in Item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☒ **NO** (go to Item VI-B)

CONTINUED FROM THE FRONT

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☐ YES (identify the test(s) and describe their purpose below)

☒ NO (go to Section VIII)

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☒ YES (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

☐ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)
Pace Analytical	1638 Roseytown Road, Suites 2, 3, and 4, Greensburg, PA 15601	(724) 850-5600	All of those listed on pages V-1 to V-9
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	
		()	

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITLE (type or print)

Nelson M. Olavarria, Director Environmental Assessment & Remediation

B. PHONE NO. (area code & no.)

(713) 209-8850

C. SIGNATURE

Nelson M. Olavarria

D. DATE SIGNED

12-15-2011

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages. SEE INSTRUCTIONS.

EPA I.D. NUMBER (copy from Item 1 of Form 1)
VA0027065

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)

1. POLLUTANT		2. EFFLUENT				3. UNITS (specify if blank)				4. INTAKE (optional)	
		a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSIS	a. LONG TERM AVERAGE VALUE	b. NO. OF ANALYSES	
		(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	a. CONCENTRATION	b. MASS	(1) CONCENTRATION	(2) MASS
a. Biochemical Oxygen Demand (BOD)		Waiver									
b. Chemical Oxygen Demand (COD)		Waiver									
c. Total Organic Carbon (TOC)		Waiver									
d. Total Suspended Solids (TSS)		<4.0						1	mg/L		
e. Ammonia (as N)		Waiver									
f. Flow		Value		Value	0.035	Value	0.020	54	MGD	NA	Value
g. Temperature (winter)		Value		Value		Value	12.1	11	°C		Value
h. Temperature (summer)		Value		Value		Value	20.7	10	°C		Value
i. pH		Minimum	Maximum	Minimum	Maximum	6.40	7.51	40	STANDARD UNITS		

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitation guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. (if available)		2. MARK 'X'		3. EFFLUENT				4. UNITS (specify if blank)				5. INTAKE (optional)	
		a. BE- LIEVE D PRE- SENT	b. BE- LIEVE D AB- SENT	a. MAXIMUM DAILY VALUE	b. MAXIMUM 30 DAY VALUE (if available)	c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSIS	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE	b. NO. OF ANALYSES	
		(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		a. CONCENTRATION	b. MASS	(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)		<input type="checkbox"/>	<input checked="" type="checkbox"/>										
b. Chlorine Total Residual		<input type="checkbox"/>	<input checked="" type="checkbox"/>										
c. Color		<input type="checkbox"/>	<input checked="" type="checkbox"/>										
d. Fecal Coliform		<input type="checkbox"/>	<input checked="" type="checkbox"/>										
e. Fluoride (16984-48-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>										
f. Nitrate-Nitrite (as N)		<input type="checkbox"/>	<input checked="" type="checkbox"/>										

ITEM V-B CONTINUED FROM FRONT

1. POLLUT- ANT AND CAS NO. (if available)	2. MARK 'X'		3. EFFLUENT						4. UNITS (specify if blank)			5. INTAKE (optional)		
	a. BE- LIEVE PRES- ENT	b. BE- LIEVE DAB- SENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSIS	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS						
g. Nitrogen, Total Organic (as N)	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
h. Oil and Grease	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
i. Phosphorus (as P), Total (7723-14-0)	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
j. Radioactivity														
(1) Alpha, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(2) Beta, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(3) Radium, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(4) Radium 226, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
k. Sulfate (as SO ₄)	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(14808-79-8)														
l. Sulfide (as S)	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
m. Sulfite (as SO ₃)	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(14265-45-3)														
n. Surfactants	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
o. Aluminum, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7429-90-5)														
p. Barium, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7440-39-3)														
q. Boron, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7440-42-8)														
r. Cobalt, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7440-48-4)														
s. Iron, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7439-89-4)														
t. Magnesium, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7439-95-4)														
u. Molybdenum, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7439-98-7)														
v. Manganese, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7439-96-5)														
w. Tin, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7440-31-5)														
x. Titanium, Total	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
(7440-32-6)														

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (secondary industries, nonprocess wastewater outfalls, and non-required GC/MS fractions), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you know or have reason to believe it will be discharged in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (all 7 pages) for each outfall. See instructions for additional details and requirements.

1. POLLUT- ANT AND CAS NO. (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS		5. INTAKE (optional)		
	a. TEST- ING RE- QUIRED	b. BE- LIEVED PRE-SENT	c. BE- LIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)	d. NO. OF ANALYSI S	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSE S
				(1) CONCENT- RATION	(2) MASS	(1) CONCENT- RATION	(2) MASS	(1) CONCENT- RATION	(2) MASS	(1) CONCENTRA- TION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS												
1m. Antimony, Total (7440-36-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
2M. Arsenic, Total (7440-38-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
3M. Beryllium, Total (7440-41-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
4M. Cadmium, Total (7440-43-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
5M. Chromium, Total (7440-47-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
6M. Copper, Total (7440-50-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
7M. Lead, Total (7439-92-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
8M. Mercury, Total (7439-97-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
9M. Nickel, Total (7440-02-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
10M. Selenium, Total (7782-49-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
11M. Silver, Total (7440-22-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
12M. Thallium, Total (7440-28-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
13M. Zinc, Total (7440-68-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
14M. Cyanide, Total (57-12-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
15M. Phenols, Total	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
DIOXIN												
2,3,7,8-Tetra- chlorodibenzo- P-Dioxin (1764-01-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
				DESCRIBE RESULTS								

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1. POLLUTANT AND CAS NO. (if available)		2. MARK 'X'		3. EFFLUENT				4. UNITS (specify if blank)		5. INTAKE (optional)	
		a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		d. NO. OF ANALYSES	a. LONG TERM AVERAGE VALUE	b. NO. OF ANALYSES
					(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		(1) CONCENTRATION	(2) MASS
GC/MS - VOLATILE COMPOUNDS											
1V. Acrolein (107-02-8)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
2V. Acrylonitrile (107-13-1)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
3V. Benzene (71-43-2)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
4V. Bis (Chloromethyl) Ether (542-68-1)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
5V. Bromoform (75-25-2)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
6V. Carbon Tetrachloride (56-23-5)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
7V. Chlorobenzene (108-90-7)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
8V. Chlorobromomethane (124-48-1)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
9V. Chloroethane (75-00-3)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
10V. 2-Chloroethylvinyl Ether (110-75-8)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
11V. Chloroform (67-66-3)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
12V. Dichlorobromomethane (75-27-4)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
13V. Dichlorodifluoromethane (75-71-8)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
14V. 1,1-Dichloroethane (78-07-3)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
15V. 1,2-Dichloroethane (107-06-2)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
16V. 1,1-Dichloroethene (7535-46)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
17V. 1,2-Dichloropropane (78-07-5)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
18V. 1,3-Dichloropropane (542-72-8)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
19V. Ethylbenzene (100-41-4)		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L	
20V. Methyl Bromide (74-83-9)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							
21V. Methyl Chloride (74-87-3)		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>							

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS (specify if blank)			5. INTAKE (optional)	
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE	b. MAXIMUM 30 DAY VALUE (if available)	c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE	b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS
GC/MS - VOLATILE COMPOUNDS (continued)												
22 V. Methylene Chloride (75-09-2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
23V 1,1,2,2-Tetra-Chloroethane (79-34-5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
24V. Tetrachloro-ethylene (127-18-4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
25V. Toluene (108-88-3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
26V 1,2-Trans-Dichloroethylene (156-80-5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
27V 1,1,1-Trichloroethane (71-55-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
28V 1,1,2-Trichloroethane (79-00-5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
29V. Trichloro-ethylene (79-01-6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<5				12	ug/L			
30V. Trichloro-fluoromethane (75-69-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
31V. Vinyl Chloride (75-01-4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<2				12	ug/L			
GC/MS FRACTION - ACID COMPOUNDS												
1A. 2-Chlorophenol (95-57-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
2A. 2,4-Dichloro-phenol (120-83-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
3A. 2,4-Dimethyl-phenol (105-67-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
4A. 4,6-Dinitro-O-cresol (534-52-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
5A. 2,4-Dinitro-phenol (51-28-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
6A. 2-Nitro-phenol (88-75-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
7A. 4-Nitro-phenol (100-02-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
8A. P-Chloro-M-cresol (98-36-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
9A. Penta-chlorophenol (87-86-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
10A. Phenol (108-95-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
11A. 2,4,6-Trichlorophenol (88-06-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS (specify if blank)			5. INTAKE (optional)	
	a. TESTING REQUIRED	b. BELIEVED PRE-SENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		(1) CONCENTRATION	(2) MASS
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS												
18. Acenaphthene (83-32-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
28. Acenaphthylene (208-96-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
38. Anthracene (120-12-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
48. Benzidine (92-87-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
58. Benzo (a) Anthracene (56-55-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
68. Benzo (a) Pyrene (50-32-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
78. 3,4-Benzofluoranthene (205-98-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
88. Benzo (ghi) Perylene (191-24-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
98. Benzo (k) Fluoranthene (207-08-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
108. Bis (2-Chloroethoxy) Methane (111-91-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
118. Bis (2-Chloroethyl) Ether (111-44-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
128. Bis (2-Chloroisopropyl) Ether (108-80-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
138. Bis (2-Ethylhexyl) Phthalate (117-81-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
148. 4-Bromophenyl Phenyl Ether (101-55-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
158. Butyl Benzyl Phthalate (85-88-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
168. 2-Chloronaphthalene (91-58-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
178. 4-Chlorophenyl Phenyl Ether (7005-72-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
188. Chrysene (218-01-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
198. Dibenzo (a,h) Anthracene (53-70-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
208. 1,2-Dichlorobenzene (95-50-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									
218. 1,3-Dichlorobenzene (541-73-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									

1. POLLUT- ANT AND CAS NO. (if available)	2. MARK 'X'			3. EFFLUENT				4 if blank			5. INTAKE (optional)					
	a. TEST- ING RE- QUIRED	b. BE- LIEVED PRE-SENT	c. BE- LIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSI S	a. CONCEN- TRATION		b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSE S
				(1) CONCENT- RATION	(2) MASS	(1) CONCENT- RATION	(2) MASS	(1) CONCENT- RATION	(2) MASS		(1) CONCENTRATI ON	(2) MASS		(1) CONCENTRATI ON	(2) MASS	
GC/MS - BASE/NEUTRAL COMPOUNDS (continued)																
22B. 1,4-Dichloro- benzene (106-46-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
23B. 3,3'-Dichloro- benzidine (91-94-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
24B. Diethyl Phthalate (84-96-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
25B. Dimethyl Phthalate (131-11-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
26B. Di-N-Butyl Phthalate (84-74-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
27B. 2,4-Dinitro- toluene (121-14-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
28B. 2,6-Dinitro- toluene (606-20-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
29B. Di-N-Octyl Phthalate (117-84-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
30B. 1,2-Diphenyl- hydrazine (as Azo- benzene) (122-96-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
31B. Fluoranthene (206-44-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
32B. Fluorene (86-73-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
33B. Hexa- chlorobenzene (118-74-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
34B. Hexa- chlorobutadiene (87-68-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
35B. Hexachloro- cyclopentadiene (77-47-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
36B. Hexa- chloroethane (87-72-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
37B. Indeno (1,2,3- cd) Pyrene (183-39-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
38B. Isophorone (78-59-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
39B. Naphthalene (91-20-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
40B. Nitrobenzene (98-95-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
41B. N-Nitro- sodimethylaniline (62-75-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													
42B. N-Nitrosdi-N- Propylamine (62164-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>													

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NO. (if available)		2. MARK 'X'		2. EFFLUENT				3. UNITS (specify if blank)		4. INTAKE (optional)		
		a. TESTING REQUIRED	b. BELIEVED PRE-SENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		d. NO. OF ANALYSIS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
					(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)												
43B. N-Nitrosodiphenylamine (86-30-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
44B. Phenanthrene (85-01-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
45B. Pyrene (129-00-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
46B. 1,2,4-Trichlorobenzene (120-82-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
GC/MS FRACTION - PESTICIDES												
1P. Aldrin (309-00-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
2P. α-BHC (319-84-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
3P. β-BHC (319-85-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
4P. γ-BHC (58-89-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
5P. δ-BHC (319-86-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
6P. Chlordane (57-74-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
7P. 4,4'-DDT (50-29-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
8P. 4,4'-DDE (72-55-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
9P. 4,4'-DDD (72-54-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
10P. Dieldrin (80-57-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
11P. α-Endo-sulfan (115-29-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
12P. β-Endo-sulfan (115-29-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
13P. Endosulfan Sulfate (103-107-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
14P. Endrin (72-20-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
15P. Endrin Aldehyde (7421-93-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
16P. Heptachlor (78-44-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								

1. POLLUT- ANT AND CAS NO. (if available)		2. MARK 'X'		3. EFFLUENT						4. UNITS (specify if blank)		5. INTAKE (optional)			b. NO. OF ANALYSES
a. TEST- ING RE- QUIRED	b. BE- LIEVED PRE- SENT	c. BE- LIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSI S	a. CONCENT- TRATION	b. MASS	a. LONG TERM AVERAGE VALUE	(1) CONCENTRA- TION	(2) MASS	
GC/MS - PESTICIDES (continued)															
17P. Heptachlor Epoxide (1024-57-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
18P. PCB-1242 (53469-21-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
19P. PCB-1254 (11097-68-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
20P. PCB-1221 (11104-28-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
21P. PCB-1232 (11141-16-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
22P. PCB-1248 (12672-29-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
23P. PCB-1260 (11096-82-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
24P. PCB-1016 (12674-11-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
25P. Toxa-phene (6001-35-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												

VPDES Permit Application Addendum

1. **Entity to whom the permit is to be issued:** Cooper Industries, LLC

Who will be legally responsible for the wastewater treatment facilities and compliance with the permit? This may or may not be the facility or property owner.

2. **Is this facility located within city or town boundaries?** No

Include a topographic map identifying the location of the facility, the property boundaries, and the discharge point.

3. **What is the tax map parcel number for the land where this facility is located?** 03100-00-00-021AO

4. **For the facility to be covered by this permit, how many acres will be disturbed during the next five years due to new construction activities?** unknown

5. **ALL FACILITIES: What is the design average flow of this facility?** 0.031 MGD

Industrial facilities: **What is the max. 30-day avg. production level (include units)?** 0.04 MGD

In addition to the above design flow or production level, should the permit be written with limits for any other discharge flow tiers or production levels? No

If "Yes", please specify the other flow tiers (in MGD) or production levels: NA

Please consider: Is your facility's design flow considerably greater than your current flow? Do you plan to expand operations during the next five years?

6. **Nature of operations generating wastewater:**

Groundwater extraction and treatment system

0 % of flow from domestic connections/sources

Number of private residences to be served by the wastewater treatment facilities: 0 1-49 50 or more

100 % of flow from non-domestic connections/sources

7. **Mode of discharge:** Continuous X Intermittent Seasonal

Describe frequency and duration of intermittent or seasonal discharges:

System discharges approximately 3 to 4 times per hour for 5 to 10 minutes

8. **Identify the characteristics of the receiving stream at the point just above the facility's discharge point:**

Permanent stream, never dry

X Intermittent stream, usually flowing, sometimes dry

Ephemeral stream, wet-weather flow, often dry

Effluent-dependent stream, usually or always dry

Lake or pond at or below the discharge point

Other:

9. **Approval Date(s):**

O & M Manual 12/99 **Sludge/Solids Management Plan**

Have there been any changes in your operations or procedures since the above approval dates? No

10. **Date that a copy of the application was sent to the Virginia Department of Health?** Will be sent when submit application

PUBLIC NOTICE BILLING INFORMATION

I hereby authorize the Department of Environmental Quality to have the cost of publishing a public notice billed to the Agent/Department shown below. The public notice will be published once a week for two consecutive weeks in Daily Progress in accordance with 9 VAC 25-31-290.C.2.

Agent/Department to be billed: Cooper Industries, LLC

Owner: Cooper Industries, LLC

Agent/Department Address: PO Box 4446
Houston, Texas 77210

Agent's Telephone No.: (713)209-8850

Printed Name: Nelson M. Olavarria

Authorizing Agent – Signature: Nelson M. Olavarria

Date: 11-21-2011

VPDES Permit No. VA0027065
Cooper Industries, LLC

**VPDES/VPA Permit Billing Information Form
for Annual Maintenance Fee**

Facility Name: Cooper Industries WWTP

Permit Number: VA0027065

Owner Name: Cooper Industries, LLC

Owner Address: PO Box 4446

Houston, Texas 77210

Billing Contact Name: Nelson M. Olavarria

Title: Director Environmental Assessment & Remediation

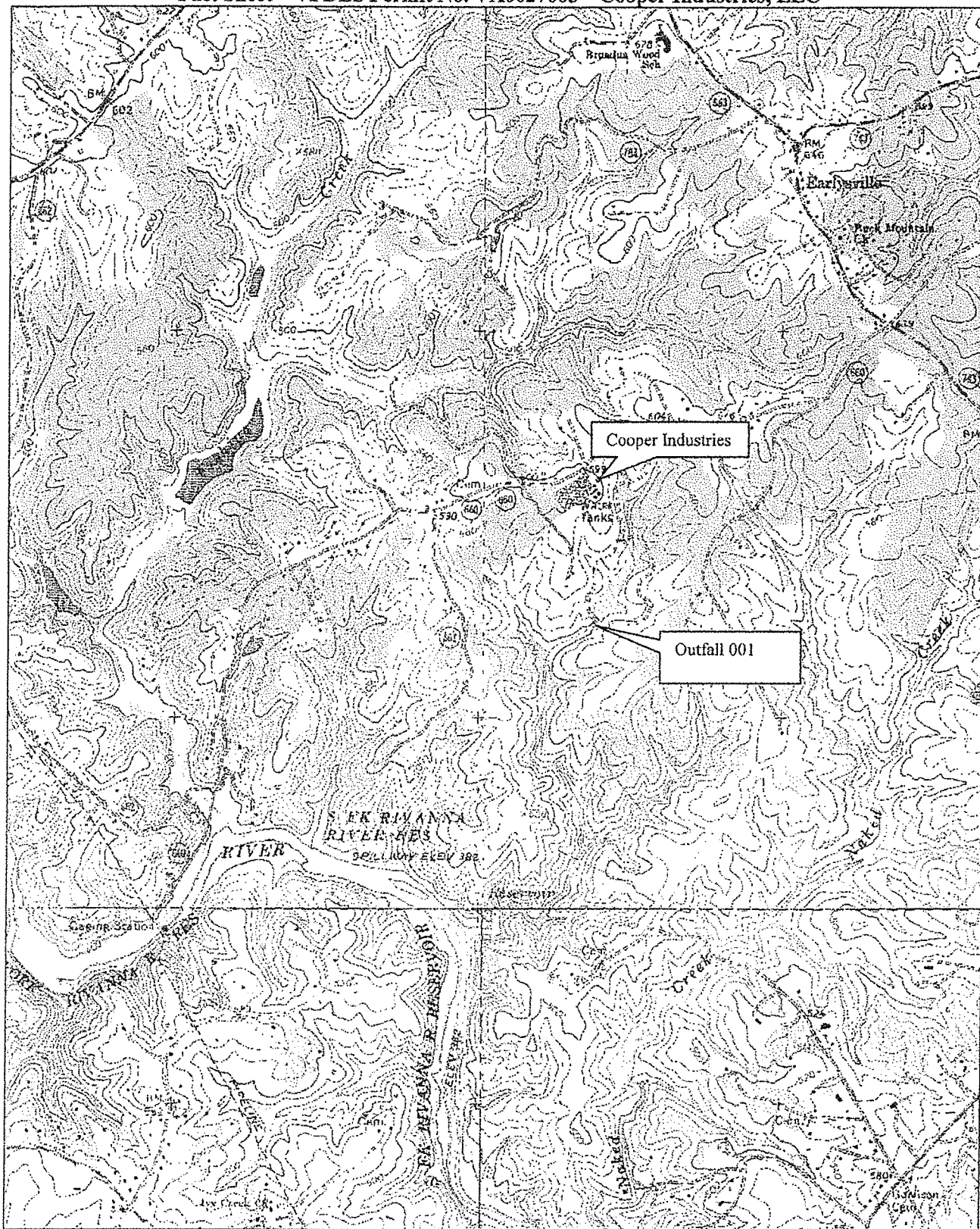
Phone Number: (713)209-8850

E-Mail Address: Nelson.Olavarria@CooperIndustries.com

ATTACHMENT A

Topographic Map showing Outfall 001 Location

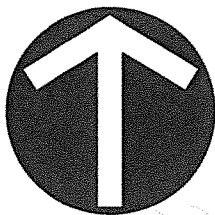
Fact Sheet – VPDES Permit No. VA0027065 – Cooper Industries, LLC



3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS 700 ft Scale: 1:24,000 Detail: 13-0 Datum: WGS84

ATTACHMENT B

Site Plan



NORTH

21D

21A

390

395

WS-5

450

25A

25D

24A

21D

26D

ART-1

WS-3A

SHALLOW MONITORING WELL

DEEP MONITORING WELL

FORMER/CURRENT RECOVERY WELL
(DEEP AQUIFER)

ART WELL

FORMER/CURRENT WATER SUPPLY WELL
(DEEP AQUIFER)

TOPOGRAPHIC CONTOUR (IN FEET MSL)

PROPERTY BOUNDARY

FROM COOPER INDUSTRIES

RENT OPERATING RECOVERY

E: WS-1; WS-4; 2D; 20E;

2 35D.

22(T REMEDIATION WELLS (ART-1,
ND ART-3) ARE IN OPERATION.

SCALE IN FEET

0 300 600

28D

Stantec Consulting Services Inc.

DRAWING TITLE:

SITE PLAN

EARLYSVILLE, VIRGINIA

BY: REVIEWED BY:
CRG

BY: REVIEWED BY:
CRG

E: SCALE:
AS SHOWN

PREPARED FOR:
COOPER INDUSTRIES

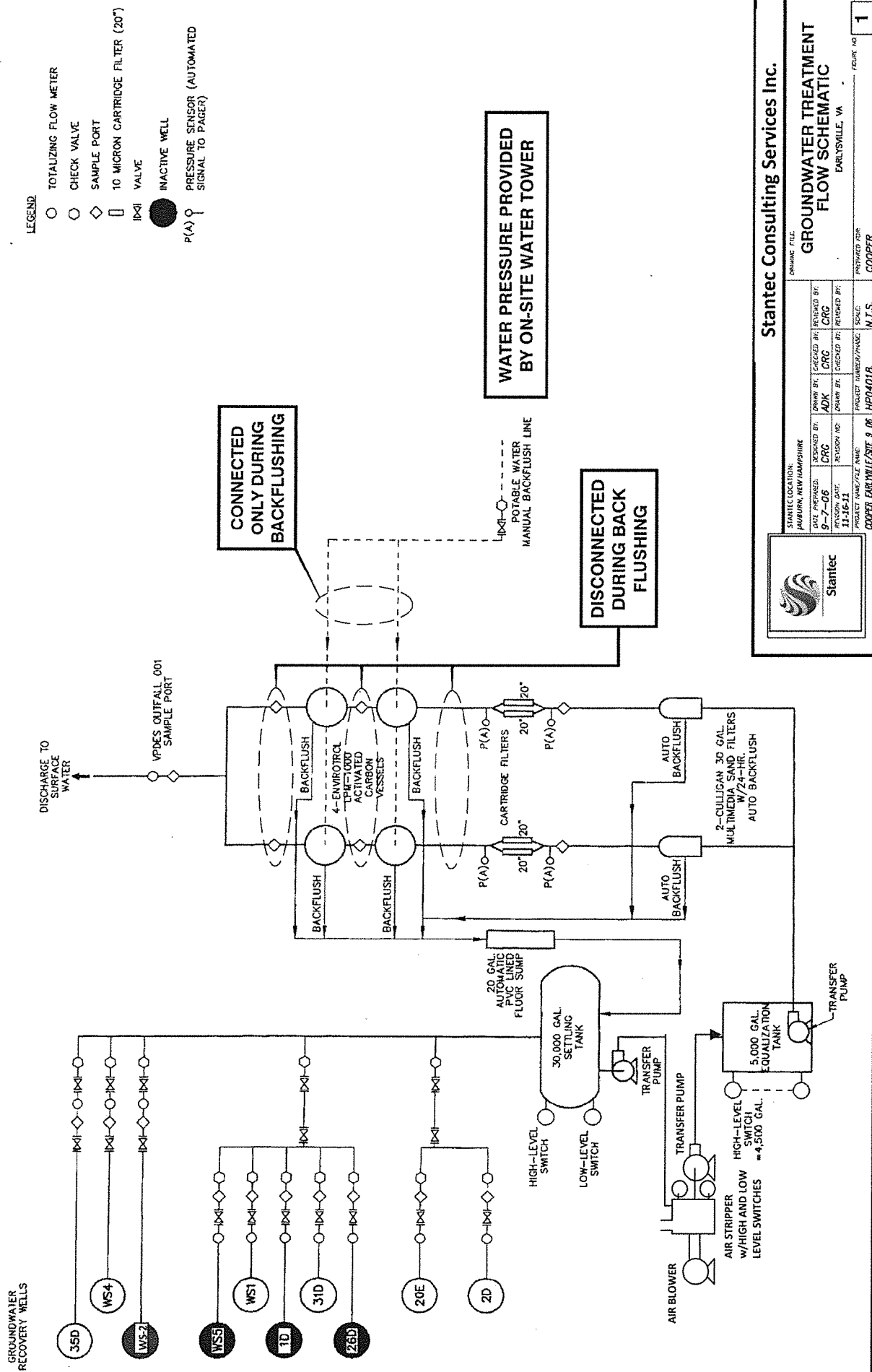
FIGURE NO.

2

ATTACHMENT C

Wastewater Treatment Plant Schematic

An Air Stripper is being incorporated to remove VOCs prior to GAC Treatment. For each of the two parallel GAC treatment trains, the upstream GAC unit is changed out once the VOC threshold has been reached. At that point, the downstream GAC unit is moved to the upstream position and a fresh (unused) GAC unit is moved into the downstream position.



Stantec Consulting Services Inc.

GROUNDWATER TREATMENT FLOW SCHEMATIC

EARLYSMILE. VA

FIGURE NO. 1

WILL CUNNINGHAM

SCALE:

PROJECT NUMBER:

PROJECT NAME/FILE NAME
TR-07-07

;

ATTACHMENT D

**Excerpt from the most recent Semi-Annual Groundwater Monitoring Report under the RCRA
Corrective Measures Implementation Plan (CMIP)**



**FIRST SEMI-ANNUAL 2011
GROUNDWATER MONITORING REPORT
EARLYSVILLE, VIRGINIA**

Prepared for

Cooper Industries, LLC
Houston, Texas

Prepared by

STANTEC CONSULTING SERVICES, INC.
Offices across the US and Canada

August 2011

**FIRST SEMI-ANNUAL 2011
GROUNDWATER MONITORING REPORT
EARLYSVILLE, VIRGINIA**

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**FIRST SEMI-ANNUAL 2011
GROUNDWATER MONITORING REPORT
EARLYSVILLE, VIRGINIA**

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1.0 INTRODUCTION

This report includes semi-annual groundwater data as required by the EPA Region III Corrective Measures Implementation Program (CMIP) Consent Order, effective April 22, 1992. The CMIP was revised in December 1999 with EPA approval. This report is meant to fulfill the requirements of the Semiannual/Annual Progress Reports and the Biannual O&M Assessment Reports as specified in the CMIP.

1.1 SITE LOCATION

The former Cooper Industries, LLC (Cooper) facility ("Facility") is situated on approximately 80 acres of land in Earlysville, Albermarle County, Virginia (Figure 1). The "Site" is bisected by Reis Ford Road, with the larger part of the Site on the south side of that road (Figure 2). The Site is comprised of one large building with several smaller structures located nearby, to the south and east. The former main manufacturing building measures approximately 220,000 square feet. The main building is used for light assembly, while the use of the eastern adjacent building is divided between a retail warehouse and a medical clinic. The Site is surrounded on all sides by residential lots, except at the northeast corner where there is a fire station.

1.2 SITE HISTORY

The Facility opened in 1962 as Panorama Corporation. Prior to Cooper's acquisition of the Facility in 1981, it was owned and operated by Murray Manufacturing and Arrow Hart (owned by Crouse-Hinds). The Facility manufactured electrical distribution equipment throughout its history. Site operations included stamping, grinding, welding, painting, and plating of metal parts.

Cooper sold the manufacturing assets to Siemens Energy and Automation, Inc. (Siemens) in 1992 and Siemens leased the building. Siemens discontinued plating operations and continued to manufacture electrical distribution equipment, and vacated the Facility in 1997. In April 1999, Cooper sold the property to Mr. Donnie Foster, the current owner. As of this writing, Mr. Foster had put redevelopment plans temporarily on hold until the local economic conditions improve.

1.3 SITE ENVIRONMENTAL ACTIONS

Corrective measures have been on-going at this Site since the discovery of contamination in 1984. The Resource Conservation Recovery Act (RCRA) Facility Investigation (RFI) for the Site was completed in 1991. The Corrective Measures Implementation Plan (CMIP) was approved by the USEPA in 1993 and again in December 1999, after additional remedial investigations (RI) were completed by Cooper. Cooper received its current Virginia Pollutant Discharge Elimination System (VPDES) Permit (No. VA0027065) to discharge treated groundwater on July 8, 2002, which was modified on November 30, 2005 to quarterly monitoring. Cooper's VPDES Permit Renewal application was approved by the Virginia Department of Environmental Quality (VDEQ) on July 15, 2007 and expires on June 30, 2012 (a Renewal Application is in preparation). The Permit requires quarterly monitoring for pH, flow,

and Total Residual Chlorine and the submittal of quarterly Discharge Monitoring Reports (DMRs).

Historic on-site soil remediation approved by USEPA included the excavation and off-site disposal of soils from the east drain pit, sludge ponds, and in-ground paint tanks. A sanitary pond was closed in place and a former RCRA holding pond for fire protection water was cleaned up and closed with a 2-foot clay cap cover with VDEQ approval. Subsequently, the VDEQ approved clean closure of the pond in the late-1990s based on additional RI data. Volatile Organic Compound (VOC) groundwater contamination was found downgradient of the former East Drain Pit and is being remediated through extraction from recovery wells WS-1, WS-4, 2D, 20E, 31D, and 35D. On November 8, 2007, the EPA approved the shutdown of WS-2 to limit plume migration horizontally and vertically, and due to the low VOC levels at WS-2. EPA had previously approved the shutdown of recovery well 1D due to low VOC levels, insufficient, sustainable recovery rates, and the presence of recovery well WS-1 located nearby. The extracted recovery well water is passed through a 60K equalization tank, then a series of sediment and sand filters, and then through four 1,000-pound activated carbon filters to remove VOCs prior to VPDES Outfall 001 discharge. WS-3A and WS-3 continue to be free of VOC impacts and operate as water supply wells for the Site, but also have carbon filtration filters for contingency purposes.

EPA approved the testing of the ART technology at the Site. The ART technology combines in situ air stripping, air sparging, soil vapor extraction (SVE), and enhanced bioremediation/oxidation—plus subsurface groundwater circulation. In advance of its application at this Site, Cooper applied for, and received, an Exemption from Air Permitting from VADEQ on February 1, 2008. The ART Well (now called ART-1) was installed and tested for its water quality in mid-June 2008. The well was located between 2D and 31D and has been added to the base plan (see Figure 2). Well installation and start-up testing results were provided to the VADEQ and USEPA in several updates. Pre-start-up total VOC concentrations were shown to be on the order of 18,000 ug/L (or ppb) in the ART Well and initial yield tests suggested that the well would be suitable for the ART technology. The ART system was placed into continuous operation on October 29, 2008. On May 13, 2009, after about six months of ART system operation, the water quality at ART-1 was tested and shown to be non-detect for all analytes.

In November 2009, two additional ART Wells were installed at the Site in the general vicinity of the first ART Well with USEPA approval. The two wells were fitted with ART apparatus and connected to the existing ART air compressor/blower unit. All three wells (ART-1, ART-2, and ART-3, see Site Plan, Figure 2) were left in continuous operational mode on December 3, 2009, under the observation of VADEQ representatives, and remain operational today.

1.4 CONTAMINANTS OF CONCERN

Historically, several VOCs have been detected in the groundwater samples collected from the Site. The VOC contaminants include tetrachloroethene (PCE) and degradation products trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), and 1,1-dichloroethene (1,1-DCE).

Other contaminants detected in past sampling events have included relatively low levels of 1,1,1-trichloroethane (TCA) and chloroform. The concentrations of 1,1,1-TCA are well below its 200 ug/L maximum contaminant level (MCL). Chloroform has not historically been a contaminant of concern at the facility and is most likely due to chlorination and cleaning of the wells with bleach and potable water for microorganism buildup and fouling of the well. The detections of chloroform are well below its 80 ug/L MCL.

The main contaminants of concern and their respective maximum contaminant levels (MCLs) are:

<u>Contaminant</u>	<u>MCL</u>
TCE	5 µg/l
1,1,1-TCA	200 µg/l
PCE	5 µg/l
Cis-1,2-DCE	70 µg/l
1,1-DCE	7 µg/l
Chloroform	80 µg/l

The on-site point of compliance (POC) wells include Well 23D, located beyond the on-site, downgradient edge of the VOC plume, and Recovery Wells WS4 and Well 31D, which are located immediately downgradient from the East Drain Pit.

2.0 SEMI-ANNUAL ACTIVITIES

2.1 SYSTEM OPERATION AND MAINTENANCE

In order to assure proper operation of the remediation system, Cooper retains several contractors. The contractors include The Environmental Company (TEC) to collect quarterly (starting in January 2006) carbon filter samples, Sullivan Electric, Inc. (Carroll Sullivan) to maintain the well pumps and filters, and Stantec to coordinate daily system operation and monitoring requirements, to conduct the semi-annual groundwater monitoring and reporting, and to assist with the preparation and submittal of the VPDES DMRs electronically.

2.2 GROUNDWATER SAMPLING

Cooper conducts routine groundwater monitoring on a semi-annual basis. The current groundwater monitoring program is summarized in Table 1. The purpose of this program is to evaluate the concentrations of VOCs in groundwater through time and to measure the effectiveness of the groundwater recovery and treatment system. Cooper received verbal permission in April 2001, and written permission from the United States Environmental Protection Agency (EPA) in May 2001, to decrease the sampling frequency in wells 14D, 18D, 27A and 27D to biennial and to discontinue sampling at wells 24D and 25D. Cooper received permission from the EPA in October 2004 to use Passive Diffusion Bag (PDB) sampling in place of low-flow purging at this Site.

The groundwater sampling event described herein was conducted on April 27-28, 2011 by Stantec. Stantec personnel collected water level measurements at accessible well locations and samples from those wells specified on Table 1. During this sampling event (with written EPA approval), Cooper used Passive Diffusion Bag ("PDB" or "diffusion") samplers to collect the groundwater samples from all of the required monitoring wells that were not recovery wells. The use of diffusion samplers eliminates any sampling equipment cross-contamination issues. Diffusion samplers distributed by Columbia Analytical Services (CAS) of Rochester, New York were installed in each of the sampling locations during the second week of April 2011 and allowed to stabilize a minimum of two weeks prior to sampling on April 27-28, 2011. Each diffusion sampler was placed in its protective polyethylene mesh attached to stainless steel line and was lowered to the target sampling depth in each well. CAS is one of two distributors authorized by the United States Geological Survey (USGS) in their 2001 User's Guide to distribute diffusion samplers. Stantec retrieved the diffusion samplers from the wells and prepared the samples for lab analysis following EPA guidance/procedures. Prior to removing the PDBs, groundwater levels were measured in each monitoring well to provide groundwater elevation data for the development of groundwater elevation contour maps used to determine groundwater flow directions. The content from each sampler was poured directly into properly preserved VOC sampling containers provided by Pace Analytical (Pace) of Export, Pennsylvania.

The remaining sampling locations were from recovery wells that were equipped with dedicated groundwater recovery equipment. For this reason, groundwater samples were collected from the

wellhead sampling ports at the recovery wells; a manner consistent with previous sampling events. Well purging was accomplished by activating each recovery well.

Samples for laboratory analysis were collected in laboratory-prepared bottles containing an appropriate amount of preservative. Samples for VOC analysis were analyzed using EPA Method 8260B. Zero headspace was attained for each VOC sample vial. Samples were properly labeled and packaged for shipment to PACE in shuttles containing ice packs. Chain-of-custody protocol was adhered to during all phases of sample collection, transport, and delivery to the laboratory. Completed chain-of-custody forms are located in Appendix A along with the analytical laboratory data summary reports supplied by PACE.

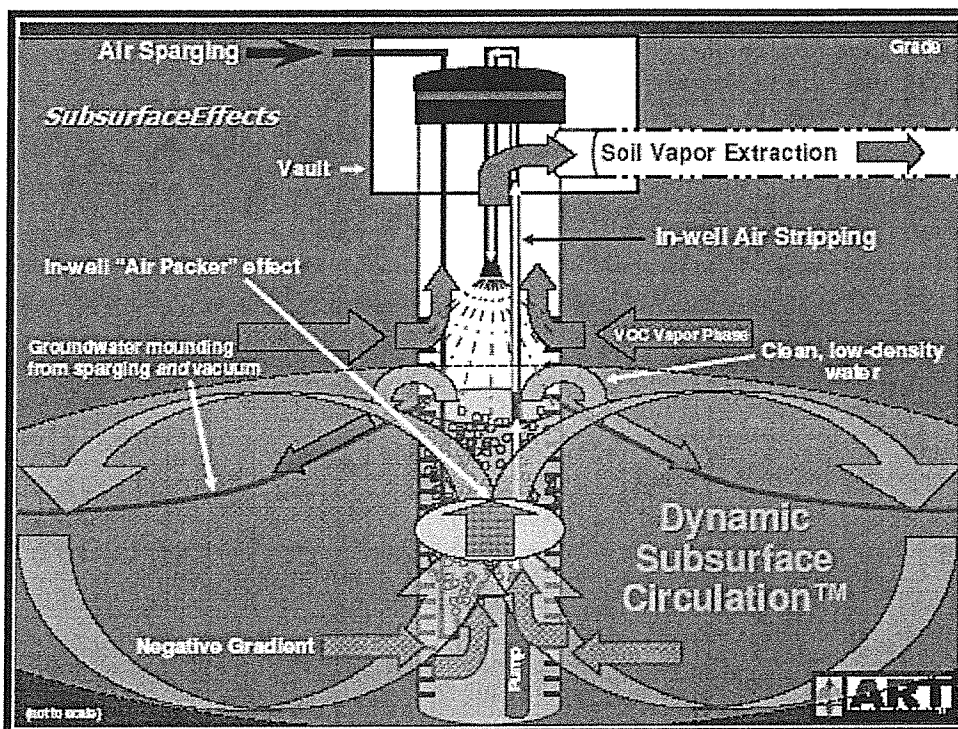
2.3 ART TESTING AND MONITORING

The first ART well, ART-1, was completed on June 11, 2008. Based on field records, bedrock was encountered at about 25 feet below land surface (bls) and the stabilized water table was at about 17 feet bls. The 6-inch PVC well screen spanned the interval from about 154 feet bls to 9 feet bls, the sand pack extended to about 8.5 feet bls, the bentonite chip seal extended from about 8.5 feet bls to 5 feet bls, and the metal protective casing was cemented in place to protect the 6-inch PVC riser. The well was developed of fines with a ½-HP submersible pump, allowed to stabilize, and then sampled for VOCs on June 12, 2008. Preliminary yield testing of the well showed that recovery rates of 3 gpm or more were possible and results from the initial water quality sampling showed total VOC concentrations on the order of 18 ppm. Both of these factors supported the continued use of the ART Pilot Well in the piloting of the ART technology. For this reason, during the period of August and September 2008, site work was completed to provide a stable foundation and electricity to the planned location of the ART equipment. The ART equipment was then delivered to the Site, placed on its foundation, and connected to the electrical supply. During the period of October 28-29, 2008, Carroll Sullivan Electric, ART, and Stantec completed the final connections between the wellhead and the ART equipment. The ART equipment consisted of the following primary components: control panel; compressor; regenerative vacuum blower; and moisture separator. Equipment at/in the well consisted of a downhole submersible pump and in-well water diffuser loop, downhole air sparging connection at the wellhead, and soil vapor extraction (SVE) connection at the wellhead. A schematic of the well/wellhead set-up is shown below. The ART equipment was located about 20 feet from the wellhead.

ART-2 and ART-3 were completed during the period of November 4-6, 2009 and fitted with access manholes on November 18, 2009. These two wells were located within about 70 feet of the existing ART Well at the Site, ART-1 (see Figure 2). Based on field records, bedrock was encountered at about 32 and 36 feet below land surface (bls) at ART-2 and ART-3, respectively, and the water table was measured at 28.0 feet below the base of the manhole top at ART-2, and 52.10 feet below the base of the manhole top at ART-3. The 6-inch, Schedule 40, 10-slot, PVC well screen spanned the interval from about 8 feet bls to 90 feet bls and about 8 feet bls to 110 feet bls in ART-2 and ART-3, respectively. At both locations, the sand pack extended to about 8 feet bls, the bentonite chip seal extended from about 5 feet bls to 8 feet bls, and the access manholes were then installed to grade. Both wells were developed to remove fines with a ½-HP submersible pump, allowed to stabilize, and then sampled for VOCs on December 2, 2009.

Preliminary yield testing of the well showed that recovery rates of roughly 5 gpm or more were possible and results from the initial water quality sampling showed total VOC concentrations on the order of 1,500 to 3,000 ppb. Both of these factors supported the use of these two wells in the ART system at the Site.

ART-2 and ART-3 were fitted with ART apparatus and connected to the existing ART compressor/blower unit in early-December 2009. Equipment at/in the well consisted of a downhole submersible pump and in-well water diffuser loop, downhole air sparging connection at the wellhead, and soil vapor extraction (SVE) connection at the wellhead. A schematic of the well/wellhead set-up is shown below.



Once the final connections were made, the groundwater recirculating loop was initiated, and then the sparge pressure and SVE vacuum were optimized until all components were running smoothly. Shutdown sequences, such as low vacuum pressure, high water level in the moisture separator, etc., were then actuated and shown to be functioning properly. Condensate from the moisture separator associated with the SVE portion of the system is manually collected and transferred to the 60K gallon equalization tank for treatment through the groundwater treatment system.

All three wells (now called ART-1, ART-2, and ART-3, see Site Plan, Figure 2) were placed in continuous operational mode on December 3, 2009, under the observation of VADEQ representatives, and remain operational today. Later that day, a vapor sample was collected from the discharge stack (24-hour Summa Canister). The results from the vapor sample showed a

TVOC concentration of 1,120 ug/m³, which was well below the levels allowed in the Exemption from Air Permitting.